



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

December 13, 2010
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: November 2010 Monthly Report for UAO and December 2010 Monthly Report for
Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15th of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation and submittal of the Draft Preliminary Site Characterization Report (PSCR) dated November 2, 2010; and (2) preparation of the Final PSCR dated November 30, 2010 based on EPA

comments on the Draft PSCR as provided in Mr. Miller's letter dated November 10, 2010.

2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
 - Preparation of the Draft Baseline Ecological Risk Assessment (BERA) Report;
 - Preparation of the Draft Remedial Alternatives Memorandum (RAM); and
 - Preparation of the Draft RI Report.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
 - Mobilization of Removal Action subcontractor to Site (on November 15) and initiation of Removal Action field activities;
 - Submittal of Financial Assurance;
 - Discharge of accumulated water within tank farm containment area to the Intracoastal Waterway pursuant to Texas Commission on Environmental Quality (TCEQ) letter dated July 27, 2010 (this discharge was performed on November 16 prior to any tank content removal activities and the content material drip within the containment area that was reported to Mr. Miller on November 30, 2010); and
 - Partial removal and off-site management of tank contents.
2. Removal Action analytical data received during the reporting period – In preparation for tank demolition activities, an asbestos inspection of suspected asbestos-containing materials in the tank farm area was performed. The inspection report is provided as Attachment A to this letter. Pursuant to Paragraph 33 of the Settlement Agreement, the name and qualifications of the inspector and laboratory performing the asbestos inspection and testing work are also provided in the report attached as Attachment A, as is the laboratory quality program information (pursuant to Paragraph 40.a.).
3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – Field activities, including tank content removal and

Mr. Gary Miller and Ms. Rita Engblom
December 13, 2010
Page 3

off-site disposal, are anticipated to be completed by the end of January 2011. No problems are anticipated.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

ATTACHMENT A
TANK FARM ASBESTOS INSPECTION REPORT

Asbestos Inspection

**Tank Farm
906 Marlin Avenue
Freeport Brazoria County, Texas 77541**



Report 20110073 / November 19, 2010

November 19, 2010

Mr. Tony Maag
Columbia Environmental Services, Inc.
13222 Reeveston Road
Houston, Texas 77039
713-868-4845 ext 5651 email tmaag@columbiaenviro.com

RE: 20110073

Dear Mr. Maag:

Phase Engineering, Inc. (Texas Department of State Health Services [TDSHS] license # 10-0224) has conducted an asbestos inspection for demolition purposes of the suspect materials in the tank farm area located at 606 Marlin Avenue, Freeport, Brazoria County, Texas 77541.

- ❖ Date of Inspection: November 16, 2010.
- ❖ Location Contact: Mr. Tony Maag, Telephone 281-740-6607.
- ❖ Site maps were not provided by client.
- ❖ Known areas not available for access: None (0).
- ❖ Person(s) Conducting Inspection & Texas Department of State Health Services (TDSHS) License Number: Neal Barnes TDSHS # 105626.
- ❖ Total number of samples taken: Seven (7).
- ❖ Number of samples analyzed: Seven (7).
- ❖ Number of samples containing more than 1% asbestos: One (1).
- ❖ Number of samples containing asbestos but less than 1%: None (0).
- ❖ Laboratories Conducting Analysis and Method: Micro Analytical Services. (TDSHS License number # 30-0304), Methods – Interim 40 CFR Part 763 Appendix E to Subpart E Environmental Protection Agency (EPA), Improved EPA 600/R-93/116. 94

The potential Asbestos Containing Building Material (ACBM) samples collected (potential ACBMs that tested positive for asbestos or are assumed positive are shaded in yellow), their descriptions, and their locations are summarized in the following table:

Sample Number	Type / Condition	Well# / Location	Friable/Percent Asbestos
1-1-I-1	Loose Insulation – White Fibrous Insulation / Damaged	Northeast Metal Flanked Catch Area	Yes / None Detected
2-2-G-1	Metal Gasket Material – Rusted Non-fibrous Metal / Damaged	Southeast Tank in Northeast Berm Area	No / None Detected
3-3-G-1	Gasket Material – Black Fibrous Gasket + Beige Paint / Good	Piping in Northeast Berm Area	No / None Detected
4-4-H-1	Hose Material – Black Fibrous Hose / Good	Northeast Berm Area	No / None Detected
5-5-G-1	Gasket Material – Gray Fibrous Transite / Good	Southeast AST In Southeast Berm Area	Yes / 4% Chrysotile
6-6-G-1	Gasket Material – Green Fibrous Gasket Material / Good	Third AST from the Northwest End of Southeast Berm Area	Yes / None Detected
7-7-I-1	Tank Insulation – Dark Non-fibrous Mastic / Damaged	Third AST from the Northwest End of Southeast Berm Area	Yes / None Detected

See lab results and sample photographs attached to this letter. Under EPA 600/R-93/116; Interim 40 CFR Part 763 Appendix E to Subpart E it is not necessary to separate layers for point counting if the individual components are proportioned equally.

The inspection performed by Phase Engineering, Inc. was a suspect asbestos containing materials (ACMs) inspection for demolition purposes of the suspect materials in the tank farm area located at 606 Marlin Avenue, Freeport, Brazoria County, Texas 77541 following the National Emission Standards for Hazardous Air Pollutants (Title 40 CFR, Part 61). The inspector was provided no historical documentation of original construction or renovations of the buildings. No previous asbestos inspection reports or abatement reports were provided to the inspector. **This inspection is not intended to comply with AHERA 40 CFR 763.** All ACMs found and their homogeneous areas are assumed to be asbestos containing until a full asbestos inspection has been conducted.

Site Specific Details:

- The sampling protocol followed for this inspection was intended for demolition purposes of the suspect materials in the tank farm area located at 606 Marlin Avenue, Freeport, Brazoria County, Texas 77541.
- The specific square footage of each homogeneous suspect ACM area is not included as a part of this limited asbestos inspection.

Although Phase Engineering, Inc. uses trained and licensed inspectors in attempting to locate and identify materials potentially containing asbestos, Phase Engineering, Inc. does not warrant that all materials containing asbestos have been identified. It is possible that there are materials containing asbestos that were not found because they were not visible or accessible to the inspector, or for various other reasons, were not sampled. Moreover, it is possible that the actual quantities of materials will differ from the quantities of materials estimated during this survey.

Samples taken are categorized as either friable or non-friable. The term friable refers to the ease with which the material can be crumbled or made to produce dust using hand pressure alone. For example, ceiling tiles are generally considered friable, while floor tiles are generally considered non friable. Sheet rock wall materials are considered friable when damaged and non-friable when intact. The condition of the materials sampled is also categorized as good, damaged or significantly damaged.

A material is considered to be an ACM if it is composed of more than 1% asbestiform components.

Findings:

The results found during the asbestos inspection indicated one suspect ACMs sampled contained asbestos above 1%. The materials determined or assumed to be ACBMs are summarized in the following table:

TYPE OF MATERIAL	APPROXIMATE LOCATION OF ACBM	FRIABLE / NON-FRIABLE - CONDITION
Gray Valve Gasket	Southeast AST In Southeast Berm Area an All Gray Gaskets	Friable – Good

No other suspect ACMs analyzed were found to contain asbestos of the suspect materials in the tank farm area located at 606 Marlin Avenue, Freeport, Brazoria County, Texas 77541

Recommendations:

It is recommended that any ACMs or assumed ACMs, that will be disturbed, be removed by a licensed abatement contractor and if applicable, a licensed asbestos consultant. The TDSHS Demolition/Renovation Notification form can be used to meet the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Subpart M (NESHAP). These regulations require that written notification be submitted before beginning renovation projects that include the disturbance of any asbestos-containing material in a facility. A notification form is required before the demolition of a building or facility, even when no asbestos is present.

This form must be used to fulfill these requirements. Please call either 512-834-6610 or 1-800-572-5548 (within Texas), or your local regional office for assistance in completing this form.

During renovation or demolition activities, care should be exercised in dealing with all materials even those shown to be non-asbestos containing (this would include materials technically considered as non-asbestos containing because they are below the one percent limit). If these non-asbestos materials are to be disturbed work practices should be used that will limit exposure to dust and debris. Contractors performing this work should conform to OSHA regulations outlined in 29 CFR 1926.55 (exposure limits can be found in 29 CFR 1910.1000 Table Z-3).

In the event of future renovation and or demolition, further sampling may be required of suspect asbestos containing materials prior to these activities to satisfy the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), and Texas Department of State Health Services (TDSHS) rules and regulations at that time. If suspect asbestos containing building materials (not noted during this inspection) should be found during any renovation or demolition, these materials should be sampled for asbestos and handled appropriately following all local, state and federal rules and regulations at that time.

If improper renovation or demolition occurs the owner is subject to a \$10,000 a day fine, enforced by the Texas Department of State Health Services (TDSHS).

Thank you for the opportunity to work with you on your environmental needs. If you have any questions, please call me at (713) 476-9844 or 1-800-419-8881.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Neal Barnes', is written over a light blue horizontal line.

Neal Barnes, P.G.
Asbestos Individual Consultant
TDSHS License # 105626

ASBESTOS SAMPLE PHOTOGRAPHS

Photo 1: 1-1-I-1



Photo 2: 2-1-G-1



Photo 3: 3-1-G-1



Photo 4: 4-4-H-1



Photo 5: 5-1-G-1



Photo 6: 6-6-G-1



Photo 7: 7-7-I-1



ASBESTOS LABORATORY RESULTS



Micro Analytical Services, Inc. 11301 Richmond Ave. Ste.K100B♦Houston♦Tx 77082♦Phone(281)497-4500♦Fax(281)497-4517

NVLAP Lab No. 200618-0

TDSHS License No. 30-0304

PLM BULK ASBESTOS ANALYSIS REPORT

CLIENT: Phase Engineering, Inc.

MAS JOB NO.: 8040-00

PROJECT: 906 Marlin

REPORT DATE: November 18, 2010

IDENTIFICATION: Asbestos, Bulk Sample Analysis, Quantitation by Visual Area Estimation

TEST METHOD: Polarized Light Microscopy with Dispersion Staining
EPA Test Method 600/M4-82-020;
Interim (40CFR Part 763 Appendix E to Subpart E)

STATEMENT OF LABORATORY ACCREDITATION

These samples were analyzed at Micro Analytical Services, Inc. in the Asbestos Laboratory at 11301 Richmond Ave. Suite K100B, Houston, Texas, 77082. The Laboratory holds accreditation from the National Institute of Standards and Technology under the National Voluntary Laboratory Accreditation Program (NVLAP). This laboratory is also licensed and authorized to perform as an Asbestos Laboratory in the State of Texas within the purview of Texas Civil Statutes, Article 4477-3a, as amended, so long as this license is not suspended or revoked and is renewed according to the rules adopted by the Texas Board of Health.

The samples were analyzed in general accordance with the procedures outlined in the Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/M4-82-020 or the U.S. Environmental Protection Agency method, under AHERA, for the analysis of asbestos in building materials by polarized light microscopy. The results of each bulk sample relate only to the material tested and the results shall not be used to claim product endorsement by NVLAP or any agency of the U.S. Government.

Specific questions concerning bulk sample results shall be directed to the Asbestos Bulk Laboratory at Micro Analytical Services, Inc.

Analyst: Tony T. Dang

Approved Signatory:



Micro Analytical Services, Inc. 11301 Richmond Ave. Ste. K100B♦Houston♦Texas 77082♦Phone(281) 497-4500♦Fax(281) 497-4517

Polarized Light Microscopy Analysis

Phase Engineering, Inc.
335 West 21st Street
Houston, Texas 77008

MAS Project #: 8040-00
Date Received: 11/17/2010
Date Analyzed: 11/18/2010

Project Name: 906 Marlin

Field ID/ Lab ID	Layer #	Sample Description	Asbestos Detected? (Yes/No)	Asbestos Constituents (%)	Non-Asbestos Constituents (%)
1-1-I-1 MAS210374	1	White fibrous insulation	No		100% fibrous Glass
2-2-G-1 MAS210375	1	Rusted non-fibrous metal	No		100% Metal
3-3-G-1 MAS210376	1	Black fibrous gasket with beige paint	No		10% Synthetic 90% Rubber
4-4-H-1 MAS210377	1	Black fibrous hose	No		10% Synthetic 30% Cellulose 60% Rubber
5-5-G-1 MAS210378	1	Grey fibrous transite	Yes	25% Chrysotile	75% Other
6-6-G-1 MAS210379	1	Green fibrous gasket	No		40% Cellulose 60% Other
7-7-I-1 MAS210380	1	Dark non-fibrous mastic	No		100% Mastic

Samples have been analyzed by the EPA Interim Method 600/M4-82-020. The test results herein relate only to the sample submitted and analyzed. This report may be only reproduced in full with the approval of the Bulk Asbestos Laboratory of Micro Analytical Services (MAS), Inc. The above percentages are visual estimates of area percent. MAS is not responsible for any errors resulting from improper or incorrect sampling or shipping procedures. These samples will be retained for a period of 30 days. Accreditation by NVLAP in no way constitutes or implies product certification, approval, or endorsement by NIST. Some materials, especially floor tiles, contain asbestos fibers too thin to be detected by this method. NVLAP Lab Code: 2000618 TDSHS License: 30-0341

Analyzed by: Tony Dang

Approved NVLAP Signatory: Tony Dang

Page 1 of 1

062113

STATEMENT OF QUALIFICATIONS



TEXAS DEPARTMENT OF STATE HEALTH SERVICES

PHASE ENGINEERING INC

is certified to perform as a

Asbestos Consultant Agency

in the State of Texas within the purview of Texas Occupations Code, chapter 1954, so long as this license is not suspended or revoked and is renewed according to the rules adopted by the Texas Board of Health.

A handwritten signature in black ink, appearing to read "David Lakey MD".

DAVID LAKEY, M.D.
COMMISSIONER OF HEALTH

License Number: 100224

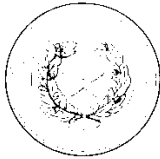
Control Number: 96277

Expiration Date: 12/26/2011

(Void After Expiration Date)

VOID IF ALTERED

NON-TRANSFERABLE



TEXAS DEPARTMENT OF STATE HEALTH SERVICES

DAVID L. LAKEY, M.D.
COMMISSIONER

1100 West 49th Street • Austin, Texas 78756
P.O. Box 149347 • Austin, Texas 78714-9347
1-888-963-7111 • www.dshs.state.tx.us
TTY: 1-800-735-2989

FEBRUARY 17, 2009

NEAL E BARNES
PHASE ENGINEERING INC
335 WEST 21ST STREET
HOUSTON, TX 77008

This is to verify that the individual shown below holds a valid credential to practice as an ASBESTOS INDIVIDUAL CONSULTANT in the State of Texas.

NAME: NEAL E BARNES
LICENSE TYPE: ASBESTOS INDIVIDUAL CONSULTANT
LICENSE NUMBER: 105626
CONTROL NUMBER: 95724
EXPIRATION DATE: 2/10/2011

If you have any questions, please contact us by phone at 512-834-6600, by fax at 512-834-6614. We encourage you to visit our website at <http://www.dshs.state.tx.us> for frequently updated information, including rules, laws, publications and forms. You may also verify a credential through this website.

Environmental & Sanitation Licensing Group

An Equal Employment Opportunity Employer and Provider



TEXAS DEPARTMENT OF STATE HEALTH SERVICES

MICRO ANALYTICAL SERVICES INC

is certified to perform as a

**Asbestos Laboratory
PCM, PLM**

*in the State of Texas within the purview of Texas Occupations Code, chapter 1954, so long as this license is not
suspended or revoked and is renewed according to the rules adopted by the Texas Board of Health.*

A handwritten signature in black ink, appearing to read "David Lakey MD".

DAVID LAKEY, M.D.
COMMISSIONER OF HEALTH

License Number: 300341

Control Number: 95623

Expiration Date: 1/25/2012

(Void After Expiration Date)

VOID IF ALTERED NON-TRANSFERABLE



**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

Micro Analytical Services, Inc.
11301 Richmond Ave., Suite K100B
Houston, TX 77082
Mr. Tony Dang
Phone: 281-497-4500 Fax: 281-497-4517
E-Mail: tdang@mas-lab.com
URL: <http://www.mas-lab.com>

BULK ASBESTOS FIBER ANALYSIS (PLM)

NVLAP LAB CODE 200618-0

NVLAP Code Designation / Description

18/A01 EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

2010-01-01 through 2010-12-31

Effective dates

Sally S. Bruce

For the National Institute of Standards and Technology

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 200618-0

Micro Analytical Services, Inc.
Houston, TX

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

BULK ASBESTOS FIBER ANALYSIS

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).*

2010-01-01 through 2010-12-31

Effective dates



Sally S. Bruce
For the National Institute of Standards and Technology

LETTER OF ENGAGEMENT

Phase Engineering, Inc.

Environmental Consultants

November 12, 2010

Mr. Tony Maag
Columbia Environmental Services, Inc.
13222 Reeveston Road
Houston, Texas 77039
713-868-4845 ext 5651 email tmaag@columbiaenviro.com

Dear Mr. Maag:

We are pleased to make the following proposal for Professional Environmental Services for the tank farm area in the property located at 906 Marlin Avenue, Freeport, Brazoria County, Texas 77541:

- **Perform an asbestos inspection to identify suspect building materials that contain asbestos by a Texas Department of Health licensed inspector for renovation purposes. Exterior and roof materials will not be sampled as part of this inspection. By signing this agreement you agree that Phase Engineering, Inc. is not liable for any damage to these areas inspected.** A minimum of three samples, of each suspect asbestos containing homogeneous building material will be taken, to satisfy the Texas Department of Health requirements for renovation/demolition of asbestos building materials. A minimum of one sample only may be required for exterior suspect asbestos containing materials sampled, if applicable. The samples will then be taken to the lab and analyzed for asbestos. It is recommended that the samples that are over one percent asbestos and under 5 percent asbestos should be point counted at the laboratory to confirm the percentage of asbestos in the building material. This analysis is more expensive than the traditional analysis (Polarized Light Microscopy) and is used when asbestos is near the one percent detection amounts. Transmission Electron Microscopy (TEM) is considered one of the most accurate methods for laboratory analysis for suspect asbestos containing building materials, however, this method is more costly and currently it is only recommended under federal regulations. Although Phase Engineering, Inc. uses trained and licensed inspectors in attempting to locate and identify materials potentially containing asbestos; Phase Engineering, Inc. does not warrant that all materials containing asbestos will be identified. It is possible that there are materials containing asbestos that were not found because they were not visible or accessible to the inspector, or for various other reasons, were not sampled.

Quoted price for inspection with sampling: \$500.00 plus \$15.00 per sample analyzed. The amount of samples taken will depend on how many will be required, at a minimum, to satisfy the regulations for renovation/demolition.

Point count analysis: \$50.00 per sample analyzed, when applicable and pre approved.

Rush fees are \$750.00 for inspection plus \$30.00 per sample analyzed.

- Includes two copies of final report with findings, conclusions and recommendations. Additional Copies @ \$50.00 each.
- Delivery: Verbal as soon as results are delivered from the laboratory. Final Report approximately 10-12 working days from receipt of laboratory results. Delivery charges may apply, not to exceed \$30.00 per delivery, unless client arranges pickup at their own expense.
- Terms: Net due upon receipt of final report.
- Insurance coverage: \$2,000,000 Professional and General Liability.

906 Marlin Avenue, Freeport, Brazoria County, Texas 77541

If the above terms and conditions are acceptable, please sign and return (fax 713 476-9797) a copy of this letter to serve as a letter of engagement and notification to proceed. The following information is needed to begin the project:

1. Access to all areas to be sampled and Contact Name & Telephone Number and Current Owner Name.
2. **Floor plans sent to our office prior to inspection. Inspection will be conducted after receipt of work plan and drawings. If project is a complete demolition these items may not be required if not available. If floor plans are not provided a \$50.00 drawing fee may apply.**
3. Entity for which the report and invoice will be addressed and delivery instructions. If no written information is provided to Phase engineering, Inc. regarding these items, the reports will be issued, billed and delivered to above.

Thank you for the opportunity to work with you on your environmental needs. If you have any questions, please call me at (713) 476-9844 or 1-800-419-8881.

Sincerely,



Neal Barnes, P.G.
Asbestos Consultant

Agreed to: 

Date: 11-23-10

Default delivery is by PDF file. Initial if you prefer to have paper copies shipped. _____

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